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*Counsel to Plaintiff RDC Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC  
LIQUIDATING TRUST,

Plaintiff,

v.

DRIVE MEDICAL SPV, LLC

Defendant.

Adv. Proc. No. 22-02019 (PRW)

**SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT**

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc., and defendant, Drive Medical SPV, LLC (“Defendant”, and together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;  
and

WHEREAS, on March 1, 2022, the Parties entered into a stipulation (the "First Stipulation")  
by which the time required for Defendant to answer the Complaint was extended through and  
including April 15, 2022. The First Stipulation was approved by order entered March 3, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject  
to Court approval, to further extend the time for the Defendant to answer the Complaint to and  
including June 15, 2022.

2. All other terms set forth in the First Stipulation remain in full force and effect.

Respectfully submitted,

Dated: April 14, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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*Counsel to Plaintiff RDC Liquidating Trust*

SO ORDERED:

DATED: \_\_\_\_\_, 2022  
Rochester, New York

Dated: April 14, 2022

NORRIS McCLAUGHLIN, P.A.



Melissa A. Pena, Esquire (NY Bar No. 4213088)

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HON. PAUL R. WARREN